UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

| DISTRICT OF | SACHUSETTS ZEG / PR 12 P 5: 22 | |
|---|--------------------------------|----------------------------------|
| DEBORAH CHIN, On Behalf of Herself | T: | Civil Action No. 04-CV-10294-DPW |
| and All Others Similarly Situated, | : | 1.1 DETRICT COURT |
| • | : | Hon. Douglas P. Woodlock |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| | : | |
| Defendants. | : | |
| | : | |
| TITODIA TIONI DI DI DI GOLI I | <u> </u> : | |
| INFORMATION DYNAMICS, LLC, On | : | Civil Action No. 04-CV-10308-DPW |
| Behalf of Itself and All Others Similarly Situated. | : | TY DI D-WIII- |
| Situated, | | Hon. Douglas P. Woodlock |
| Plaintiff, | : | |
| Flainnii, | | |
| v. | : | · |
| ** | : | |
| SONUS NETWORKS, INC., PAUL R. | : | |
| JONES, EDWARD N. HARRIS, J. | | |
| MICHAEL O'HARA, HASSAN M. | | |
| AHMED and STEPHEN J. NILL. | | |
| · · · · · · · · · · · · · · · · · · · | : | |
| | | |
| Defendants. | _ | |
| ·· · | | |

AFFIDAVIT OF RICHARD A. SPEIRS IN SUPPORT OF MOTION OF PLAINTIFF SAVERIO PUGLIESE FOR CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFF, LEAD COUNSEL AND LIAISON COUNSEL

| MICHELLE TREBITSCH, On Behalf of | T: | Civil Action No. 04-CV-10307-DPW |
|--|----------|------------------------------------|
| Herself and All Others Similarly | : | |
| Situated, | : | Hon. Douglas P. Woodlock |
| Total 1 11 00 | : | |
| Plaintiff, | : | |
| V. | : | |
| , , | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| | : | |
| Defendants. | : | |
| PETER KALTMAN, Individually and | : : | Civil Action No. 04-CV-10309-DPW |
| On Behalf of All Others Similarly | : | Civil Action No. 04-C v-10309-DP W |
| Situated, | | Hon. Douglas P. Woodlock |
| | : | |
| Plaintiff, | : | |
| | : | |
| V. | : | |
| SONUS NETWORKS, INC., HASSAN | • | |
| AHMED, and STEPHEN J. NILL, | : | |
| , | : | |
| Defendants. | : | |
| | : | |
| SAMANTHA DEN, Individually and on Behalf of All Others Similarly Situated, | : | Civil Action No. 04-CV-10310-DPW |
| Bonan of An Omers Similarly Situated, | : | Hon. Douglas P. Woodlock |
| Plaintiff, | | Tion. Douglas F. Woodlock |
| | | |
| V. | : | · • |
| | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| Defendants. | : | |
| Dorondanis. | : | |
| | • | |

| RICHARD CURTIS, on Behalf of | : | Civil Action No. 04-CV-10314-MLW |
|--|----------|---|
| Himself and All Others Similarly | : | |
| Situated, | : | Hon. Mark L. Wolf |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| CONTICNITY WORKS INC. HASSAN | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| | : | |
| Defendants. | : | |
| Defendants. | : | |
| RONALD KASSOVER, on Behalf of | : | Civil Action No. 04-CV-10329-DPW |
| Himself and All Others Similarly | | Olympia di Control de |
| Situated, | 1: | Hon. Douglas P. Woodlock |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| | ; | |
| Defendants. | : | |
| STEVE L. BAKER, Individually and on | : | Civil Action No. 04-CV-10333-DPW |
| Behalf of All Others Similarly Situated, | : | TY TO 1 TO 117 11 1 |
| Plaintiff, | : | Hon. Douglas P. Woodlock |
| Flanini, | : | |
| v. | | |
| •• | | |
| SONUS NETWORKS, INC., HASSAN | • | |
| AHMED, and STEPHEN J. NILL, | | |
| ,, | : | 1.1 |
| Defendants. | : | |
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| MICHAEL KAFFEE, on Behalf of | : | Civil Action No. 04-CV-10345-DPW |
| Himself and All Others Similarly | : | |
| Situated, | : | Hon. Douglas P. Woodlock |
| | : | |
| Plaintiff, | | |
| , | . | |
| v. | : | |
| | ! | |
| SOME STETWOODER INC. HARRANT | • | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| | : | |
| Defendants. | : | |
| HAIMING HU, Individually and on | : | Civil Action No. 04-CV-10346-DPW |
| Behalf of All Others Similarly Situated, | : | |
| | : | Hon. Douglas P. Woodlock |
| Plaintiff, | : | |
| · · | • | |
| v. | | |
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| SOME IS NETWODE OF THE STAGGANT | • | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| | : | |
| Defendants. | : | |
| | : | |
| CHARLES STARBUCK, Individually | ; | Civil Action No. 04-CV-10362-DPW |
| and on Behalf of All Others Similarly | : | |
| Situated, | : | Hon. Douglas P. Woodlock |
| | • | |
| Plaintiff, | | |
| | | |
| v. | : | |
| • | | |
| SOMIS METWODES THE TRACEAST | - | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| | : | |
| Defendants. | : | |
| | : | |

| SAMUEL HO, Individually and on | : | Civil Action No. 04-CV-10363-DPW |
|--|-----------|----------------------------------|
| Behalf of All Others Similarly Situated, | : | |
| | : | Hon. Douglas P. Woodlock |
| Plaintiff | : | |
| | : | |
| v. | : | |
| | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| | : | |
| Defendants. | : | |
| | : | |
| | : | |
| JEFFREY C. RODRIGUES, Individually | : | Civil Action No. 04-CV-10364-DPW |
| and on Behalf of All Others Similarly | : | |
| Situated, | : | Hon. Douglas P. Woodlock |
| | : | |
| Plaintiff, | : | |
| | : | |
| V. | : | |
| CONTRACTOR TO THE COLUMN | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| 75.0 | : | |
| Defendants. | : | |
| | : | · |
| PODERT CONTE and MARK | : | |
| ROBERT CONTE and MARK | : | Civil Action No. 04-CV-10382-DPW |
| RESPLER, On Behalf of Themselves and all Others Similarly Situated. | : | II. D. 1 D. IV. |
| an omers sumarry situated, | : [| Hon. Douglas P. Woodlock |
| Plaintiff | : | |
| riammi | : | |
| v. | : | |
| ** | | |
| SONUS NETWORKS, INC., HASSAN | | |
| AHMED, and STEPHEN J. NILL, | | |
| The state of the s | | |
| Defendants. | | |
| Dotondants. | | |
| | • | |

| WHEATON ELECTRICAL SERVICES | T: | Civil Action No. 04-CV-10383-DPW |
|--------------------------------------|----------|-----------------------------------|
| RETIREMENT 401K PROFIT | : | |
| SHARING, On Behalf of Itself and All | : | Hon. Douglas P. Woodlock |
| Others Similarly Situated, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| | : | |
| | : | |
| Defendants. | | |
| BRIAN CLARK, On Behalf of Himself | : | Civil Action No. 04-CV-10454-DPW |
| and All Others Similarly Situated, | : | |
| | : | Hon. Douglas P. Woodlock |
| Plaintiff, | : | |
| | : | |
| V. | : | |
| | : | |
| SONUS NETWORKS, INC., PAUL R. | : | |
| JONES, EDWARD N. HARRIS, J. | : | |
| MICHAEL O'HARA, HASSAN M. | : | |
| AHMED and STEPHEN J. NILL, | : | |
| | : | |
| | : | |
| Defendants. | | |
| SHEILA BROWNWELL, On Behalf of | : | Civil Action No. 04-CV-10597-DPW |
| Herself and All Others Similarly | : | DI II |
| Situated, | : | Hon. Douglas P. Woodlock |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| , | : | |
| | : | |
| Defendants. | : | |
| SAVERIO PUGLIESE, On Behalf of | : | Civil Action No. 04-CV-10612-DPW |
| Himself and All Others Similarly | | CIVIL ACTION 140. 04-CV-10012-DPW |
| Situated, | | Hon. Douglas P. Woodlock |
| Í | | Tion. Douglas F. WOOdlock |
| Plaintiff, | : | |
| - 455-21-6-1-5 | • | |

| Defendants. | : | |
|----------------------------------|----|----------------------------------|
| | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| SONUS NETWORKS, INC., HASSAN | : | |
| | : | |
| v. | : | |
| , | : | |
| Plaintiff, | | |
| Situation, | | Tion. Douglas F. Woodlock |
| Situated, | | Hon. Douglas P. Woodlock |
| Himself and All Others Similarly | | CIVII ACUOII NO. 04-CV-10623-DPW |
| DAVID V. NOCITO, On Behalf of | : | Civil Action No. 04-CV-10623-DPW |
| Defendants. | : | |
| | : | |
| AHMED, and STEPHEN J. NILL, | : | |
| SONUS NETWORKS, INC., HASSAN | * | |
| | : | : |
| v. | : | |
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| STATE OF NEW YORK |) |
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| |) ss |
| COUNTY OF NEW YORK |) |

I, Richard A. Speirs, being duly sworn, depose and say:

- 1. I am a member of the firm of Zwerling, Schachter & Zwerling, LLP (the "Zwerling Firm"), one of the attorneys for Saverio Pugliese. I am fully familiar with all the facts and circumstances herein.
- 2. This affidavit is submitted in support of the motion of Saverio Pugliese pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, and Section 21(a)(3)(B) of the Securities Exchange Act of 1934 as amended by the Private Securities Litigation Reform Act of 1995, for consolidation and for appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel in the above-captioned actions.

- 3. Attached hereto as Exhibit A is a true and correct copy of the complaint filed in the action Pugliese, et al. v. Somus Networks, Inc., et al., No. 04-CV-10612-DPW (filed March 30, 2004).
- Attached hereto as Exhibit B is the Certification of Saverio Pugliese in Support of Motion for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel.
- Attached hereto as Exhibit C is a true and correct copy of the first notice 5.. of a class action relating to Sonus Networks, Inc. ("Sonus"), dated February 12, 2004, issued by Cauley Geller Bowman & Rudman, LLP.
- Attached hercto as Exhibit D is a firm resume of the Zwerling Firm, Pugliese's choice for Lead Counsel.
- Attached hereto as Exhibit E is a firm resume of Berman DeValerio Pease Tabacco Burt & Pucillo, Pugliese's choice for Liaison Counsel.

Richard A. Speirs

Sworn to before me this day of April, 2004

Public, State Of New York No.015C6067635 Qualified in Queens County Commission Expires Fab. 18, 2007